

Laura Vartain Horn (SBN 258485)
KIRKLAND & ELLIS LLP
555 California Street,
San Francisco, CA 94104
Telephone: (415) 439-1400
laura.vartain@kirkland.com

Jessica Davidson (Admitted *Pro Hac Vice*)
Christopher D. Cox (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, NY 10022
Telephone: (212) 446-4800
jessica.davidson@kirkland.com
christopher.cox@kirkland.com

Allison M. Brown (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
2005 Market Street, Suite 1000
Philadelphia, PA 19103
Telephone: (215) 268-5000
alli.brown@kirkland.com

Attorneys for Defendants
UBER TECHNOLOGIES, INC.;
RASIER, LLC; and RASIER-CA, LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF CHRISTOPHER V.
COTTON IN SUPPORT OF UBER'S
ADMINISTRATIVE MOTION TO SEAL
PERSONAL IDENTIFYING INFORMATION
CONTAINED IN DEFENDANTS' MOTION
FOR ENTRY OF FOURTH RECEIPTS
ORDER AND ACCOMPANYING
DOCUMENTS**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 I, Christopher V. Cotton, declare as follows:

2 1. I am an attorney at Shook, Hardy & Bacon L.L.P., counsel of record for Defendants Uber
 3 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber” or “Defendants”). I offer this
 4 Declaration in the above-captioned matter in support of Uber’s Administrative Motion to Seal Personal
 5 Identifying Information Contained in Defendants’ Fourth Fraudulent Receipts Motion for Entry of Fourth
 6 Receipts Order and Accompanying Documents (the “Sealing Motion”).

7 2. Counsel for Uber previously met and conferred with the Nachawati and Chaffin Luhana
 8 firms concerning the sealing of personally identifying information (“PII”) in connection with Uber’s
 9 Motion for Entry of (1) an Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide
 10 Receipts Should Not Be Dismissed with Prejudice and (2) a Case Management Order Addressing Certain
 11 Plaintiffs Who Have Not Submitted Receipts. ECF 3602-1. Counsel indicated that they did not oppose
 12 sealing PII, including counsel from Chaffin Luhana who serves as part of Plaintiffs’ Leadership in this
 13 matter. The Court granted Uber’s motion to seal. ECF 3616. The sealed information contained in the
 14 instant Sealing Motion is the same sort of PII that has already been filed under seal, unopposed by the
 15 Nachawati and Chaffin Luhana firms.

16 3. Counsel for Uber also previously made diligent efforts to meet and confer with Plaintiffs’
 17 counsel concerning the sealing of PII in connection with Uber’s Motion for Entry of an Order to Show
 18 Cause Why 6 Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be Dismissed with
 19 Prejudice. Those efforts are detailed in my declaration in support of Uber’s motion to seal the PII in that
 20 motion. ECF 3783-1. Counsel for Uber have not received any communications from any Plaintiff’s
 21 counsel regarding opposition to the sealing of the material detailed in ECF 3783. Part of the sealed
 22 information contained in the instant Sealing Motion is a subset of the PII that was included in Uber’s prior
 23 motion to seal, and other sealed information is the same sort of PII.

24 I declare under penalty of perjury under the laws of the United States of America that the foregoing
 25 is true and correct.

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Dated: January 7, 2026

Respectfully submitted,

By: /s/ Christopher V. Cotton

Christopher V. Cotton (admitted *Pro Hac Vice*)
SHOOK, HARDY & BACON L.L.P.
2555 Grand Blvd.
Kansas City, MO 64108
Telephone: (816) 474-6550
ccotton@shb.com

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Attorney for Defendants
UBER TECHNOLOGIES, INC.;
RASIER, LLC; and RASIER-CA, LLC

FILER'S ATTESTATION

I am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I attest that the signatories above concurred in this filing.

Dated: January 7, 2026

/s/ Luara Vartain Horn
Laura Vartain Horn